

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: NII HOLDINGS, INC.
SECURITIES LITIGATION

Case No. 1:14-cv-227-LMB-JFA

**CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT AND APPROVAL OF NOTICE TO THE CLASS**

PLEASE TAKE NOTICE THAT upon the accompanying memorandum of law and exhibits thereto, Class Representatives Danica Pension, Livsforsikringsaktieselskab, Industriens Pensionsforsikring A/S, Pension Trust Fund for Operating Engineers Pension Plan, IBEW Local No. 58 / SMC NECA Funds, and Jacksonville Police & Fire Pension Fund (collectively, “Lead Plaintiffs” or “Class Representatives”), on behalf of themselves and the certified Class, respectfully move the Court, before the Honorable Leonie M. Brinkema, United States District Judge, at the Albert V. Bryan United States Courthouse, Alexandria, Virginia, 22314, for entry of the parties’ agreed-upon Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement (“Preliminary Approval Order”), pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) preliminarily approving the proposed class action Settlement; (2) approving the proposed forms of notice of the Settlement and the methods for disseminating the notices; (3) approving the selection of A.B. Data Ltd. as Claims Administrator; (4) setting a date for the Settlement Hearing; and (5) such other and further relief as the Court deems just and proper.

The proposed Preliminary Approval Order is also filed herewith.

LOCAL RULE 37(E) STATEMENT OF COUNSEL

The undersigned counsel hereby certifies that the parties' counsel conferred on the substance of this motion and it is unopposed.

Dated: April 18, 2016

By: /s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on April 18, 2016.

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